

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

NATHAN ROBERTS, ET AL. and  
FREEDOM TRUCK DISPATCH LLC, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

PROGRESSIVE PREFERRED  
INSURANCE COMPANY, et al.,

Defendants.

Case No. 1:23-cv-01597-PAG

**MOTION FOR ADMISSION *PRO HAC VICE* OF HANNA E. MARTIN**

Pursuant to Local Rule 83.5(h), Defendants Progressive Preferred Insurance Company and Progressive Casualty Insurance Company (“Progressive”), by and through one of their attorneys, Michael J. Ruttinger, of the law firm Tucker Ellis LLP, a member in good standing of the bar of this Court, respectfully move this Court for an Order admitting Hanna E. Martin *pro hac vice* as co-counsel on behalf of Progressive in the above-captioned matter. Ms. Martin’s contact information is as follows:

Hanna E. Martin  
Morgan, Lewis & Bockius LLP  
101 Park Avenue  
New York, NY 10178  
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Ms. Martin is a member in good standing of the highest court of the State of New York, having been admitted on December 22, 2016 (bar number 5477690). No disciplinary proceedings have been filed or are pending against her, and she has not been disbarred or suspended from practice before any court, department, bureau or commission of any State in the United States.

Further, she has never received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of any bar.

A certificate of good standing issued by the New York Appellate Division, 2d. Department, which is offered in support of this motion, is attached hereto as Exhibit A. The undersigned is tendering the required \$120.00 filing fee with this Motion.

WHEREFORE, Progressive respectfully requests that this Court grant attorney Hanna E. Martin limited admission to appear in this Court, in this particular proceeding.

Dated: December 13, 2023

**PROGRESSIVE PREFERRED INSURANCE  
COMPANY and PROGRESSIVE CASUALTY  
INSURANCE COMPANY**

By its attorneys,

/s/ Michael J. Ruttinger

Michael J. Ruttinger (0083850)

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2023, a copy of the foregoing Motion for Admission *Pro Hac Vice* of Hanna E. Martin was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Michael J. Ruttinger

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*Attorney for Defendants Progressive Preferred  
Insurance Company and Progressive Casualty  
Insurance Company*